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U.S. Environmental Protection Agency
Office of Civil Enforcement; Air Enforcement Division
Marine ECA – Fuel Oil Non-Availability
1200 Pennsylvania Ave N.W.
Ariel Rios South Building, Mailcode 2242A
Washington, D.C. 20004

14 September 2015

Dear Sirs,

We, Milestone Chemical Tankers Pte. Ltd., is the commercial vessel operator of M/T Azalea Galaxy (IMO-9343778). Bunker supply is arranged by us through Mitsui O.S.K Lines Bunker Group, who communicates with bunker trader in Japan for our bunker supplies. This writing is to document the disparity between the BDN and the third party analysis on compliant LSMGO supplied.

LSMGO bunker was supplied on 21st August 2015 in Singapore. BDN issued by the bunker supplier stated LSMGO sulphur content of 0.086% m/m. First lab result by third party was released on 25th August, finding 0.28% m/m sulphur content in the supplied LSMGO. Subsequently, bunker supplier released their lab test sample which showed 0.0782% sulphur content on 31st August.

Vessel Owner declared alleged off-spec quantity supplied in Singapore was mixed with originally on-spec ROB in DO2P tank. The intended voyage plan is to sail directly from Singapore to Vancouver B.C, where vessel is not calling any ports in between, thus if compliant fuel has to be taken elsewhere, vessel needs to deviate. A joint sample analysis was proposed between the bunker supplier and vessel owner, however, it was not agreed by the former. Meanwhile, 55MT compliant LSMGO was arranged at Vancouver B.C, as this is the maximum capacity that the remaining two tanks DO1P and DO1S can carry.

Vessel may be calling Anacortes for next voyage, and shall be exiting ECA for tank cleaning purposes, before proceeding to Anacortes for loading. The 55MT compliant LSMGO may be used up before arriving to Anacortes, thus, we intend to use the alleged off-spec LSMGO in DO2P tank until vessel arrives Anacortes. We, as vessel operator, shall exercise due diligence to arrange compliant LSMGO whenever possible in Anacortes.

An official Notice of Protest (NoP) has yet to be filed as we are still in the middle of discussion with Mitsui O.S.K Lines Bunker Group on the next course of action for the LSMGO in DO2P tank.

Hope this letter finds you well, and thank you for your attention. Looking forward to your further advice if any.

Sincerely,

Tay Yun Sheng

Vessel Operator of Azalea Galaxy